

See pd.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan



 SOUTHERN

Robert S. Meadows

Case: 2:21-cv-11747

Judge: Hood, Denise Page

MJ: Stafford, Elizabeth A.

Filed: 07-13-2021 At 09:08 AM

CMP ROBERT S MEADOWS V MELISSA SCHWARTZ ET AL (SS

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Melissa Schwartz,
Brian Hartwell,
Courtney Morgan,
Michael L. Steinberg

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

| | | | |
|------------------|----------------------|-------|----------|
| Name | Robert S. Meadows | | |
| Address | 20190 Klinger Street | | |
| | Detroit | MI | 48234 |
| | City | State | Zip Code |
| County | Wayne | | |
| Telephone Number | 586 244 7897 | | |
| E-Mail Address | meadowsr61@yahoo.com | | |

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

| | | | |
|--|---------------------------------|-------|----------|
| Name | Melissa Schwartz | | |
| Job or Title (if known) | City Attorney | | |
| Address | 111 EAST NINE MILE ROAD | | |
| | HAZEL PARK | MI | 48030 |
| | City | State | Zip Code |
| County | Oakland | | |
| Telephone Number | 248 546 - 7000 / 248 423 - 6000 | | |
| E-Mail Address (if known) | yourlegalservicepllc.com | | |
| <input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity | | | |

Defendant No. 2

| | | | |
|--|-------------------------|-------|----------|
| Name | BRIAN HARTWELL | | |
| Job or Title (if known) | Judge | | |
| Address | 111 EAST NINE MILE ROAD | | |
| | HAZEL PARK | MI | 48030 |
| | City | State | Zip Code |
| County | OAKLAND | | |
| Telephone Number | 248 546-7000 | | |
| E-Mail Address (if known) | | | |
| <input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity | | | |

| | | |
|--------------------------|--------------|-----------------|
| Courtney Morgan | | |
| Chief Deputy Court Clerk | | |
| 111 EAST NINE MILE ROAD | | |
| HAZEL PARK | MI | 48030 |
| <i>City</i> | <i>State</i> | <i>Zip Code</i> |
| Oakland | | |
| 248 547-3034 | | |

Michael L. Steinberg

Attorney

300 East 4th Street Ste.# 3

| | | |
|-------------|--------------|-----------------|
| Royal Oak | MI | 48067 |
| <i>City</i> | <i>State</i> | <i>Zip Code</i> |

Oakland

248 542 - 1010 / 248 321-1801

mikoesh@gmail.com

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Prisoner)

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III. Statement of Claim

A.

On January 17, 2020, A question of law regarding a traffic stop in the city limits of Detroit, Wayne County, by an Oakland County, Hazel Park police, was presented by Plaintiff; Plaintiff immediately questioned the probable cause regarding elements presented as cause, and purchased the video recordings from the City of Hazel Park as a record of facts:

A Motion Hearing was conducted on September 03, 2020; the Court ruled to proceed; and Plaintiff requested to appeal the Court's decision by Right to Appeal; On September 04, 2020, Plaintiff spoke with 43rd District Court Clerk Office, and again on September 07, 2020, only to be told that "someone would get back with you":

On September 09, 2020, A notarized request for documents was delivered, and received by the Prosecutor and Clerk by certified mail; Although, no response by the 43rd District Court regarding the legal documents, nor information regarding right of appeal; Plaintiff paid filing fees and sought to file Appeal as of Right within the statute of limitations, but was unsuccessful:

Judge Hartwell appointed Michael Steinberg as a public defendant, and Plaintiff mailed the videos to the court appointed attorney; Plaintiff made it known that the responses which he received from 43rd District Court was not inviting, and decided he would take his chances with an all-white jury, Judge, prosecutor, clerk, and attorney;

Plaintiff has appeared before the Court ten times, with twenty-six Notices of Proceedings dating up to August 02, 2021; The Court responded that Plaintiff's right to speedy trial is non-applicable due to the pandemic; Plaintiff, after eighteen months of pandemic and continuing Court proceedings, considered waiving the right to a hearing, but more issues of law came forth and Plaintiff declined to waived the right, and immediately the Attorney requested to step down and the Court grated it on June 17, 2020; at which time the Judge and clerk agreed during the proceeding that July 29, 2021 at 10:15 AM, would be the next date to proceed; however, the Court had already scheduled the next proceeding for July 14, 2021:

On July 01, 2021, the Court alleged that Plaintiff had failed to appear for hearing, revoked the bond, and entered a Notice of Judgement against Plaintiff; On July 03, 2021, a notarized affidavit was delivered to Judge Hartwell by certified mail, the documents contained Notices of Proceedings as well as requesting him to review the Zoom conference; however, the legal document was not responded to, nor acknowledged, just as the previous acts by the other public officials; Plaintiff requested the return of video tapes from the attorney and was denied, attorney refused to make himself a copy, and two weeks later the Court entered Judgements and issued warrants against Plaintiff:

B. What date and approximate time did the events giving rise to your claim(s) occur?

Beginning September 2020 denial of access to the Court became apparent, and been deprived continually to July 01, 2021, to date:

C. What are the facts underlying your claim(s)?

Each public official in their individual capacity knowingly, or unknowingly, deprived Plaintiff the right of access to the Court system; Failed to address every legal document without bias, by addressing it accordingly; The Court held the accused, Plaintiff, to a higher standard than the public officials themselves, because the pandemic effected the planet and not just Hazel Park; This system Hazel Park, Oakland County exercises by is witnessed by thousands, as a manner of revenue at the expense of others outside the city and county; The structure of this legal monopoly exists between Judge, prosecutor, and defense attorneys, as a way to create revenue in the least expensive manner, and which means using means to deter defendants from exercising the right to a jury trial:

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IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Irreparable injuries of stress, threats of physical bondage, and humiliation continues to occur;
Fines, Fees, lost of Human Rights, and priviledges are repairable injuries:

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Plaintiff seeks to have Legal matter fully reinstated without Bond restrictions:

Bond fully reinstated, and/or have all matters regarding the Reference number 20HP01352A dismissed with prejudice:

Plaintiff seeks to be reinstated all full Rights and priviledges deprived as a reult of Ref:20H01352A:

Plaintiff seeks reimbursement of all fees and expenses associated with Ref:20H01352A:

Plaintiff seeks return of Viedo evidence he purchased and allowed Attorney to use:

On behalf of justice for every living being, and as a penalty for not upholding official duties under the color of law, these deprivations are priceless and long term damaging.

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VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/12/2021

Signature of Plaintiff

Printed Name of Plaintiff

ROBERT MEADOWS

B. For Attorneys

Date of signing: NA

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

JS 44 (Rev. 10/20)

CIVIL COVER SHEETCounty in which action arose: OAKLAND

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Robert S. Meadows

DEFENDANTSMELISSA SCHWARTZ, BRIAN HARTWELL, COURTNEY MORGAN;
MICHAEL STEINBERG(b) County of Residence of First Listed Plaintiff Wayne

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant OAKLAND

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- (For Diversity Cases Only)
- | | | | | | |
|---|----------------------------|---------------------------------------|---|---------------------------------------|---------------------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input checked="" type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES |
|---|--|--|---|---|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 LOCAL SECURITIES <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Tide XV1 <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S. Code statute 1983

Brief description of cause:
deprivation of rights**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

July 13, 2021

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☒ Yes
☐ No

If yes, give the following information:

Court: 43rd DISTRICT COURT

Case No.: 20HP01352A

Judge: BRIAN HARTWELL

Notes : HAZEL PARK, MICHIGAN

Robert Meadows
2080 Kanger St.
Detroit, MI 48224

7015 0640 0001 2016 0760

CERTIFIED MAIL



7015 0640 0001 2016 0760



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Attor: Clerk

United States District Court

for the

Eastern District of Michigan

Theodore Levin U.S. Courthouse

231 Lafayette Blvd., Room 599

Detroit, MI 48226

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